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8 UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9 SAN JOSE DIVISION

10 NATIONAL URBAN LEAGUE, et al.,

CASE NO. 5:20-cv-05799-LHK

11 Plaintiffs,

**DECLARATION OF  
SHEILA VALENZUELA**

12 v.

13 WILBUR L. ROSS, JR., et al.,

14 Defendants.  
15

16 I, Sheila Valenzuela, am over 18 years of age, and am providing this declaration at the  
17 request of attorneys for the Gila River Indian Community (the "Community"). If called to  
18 testify, I would testify to the following information.

19 1. I am the Enrollment/Census Director for the Gila River Indian Community. My  
20 job duties include leading the efforts of the Gila River Indian Community to promote accurate  
21 counting of the Community's population in the 2020 U.S. Census. As part of these efforts, I  
22 coordinate with the U.S. Census Bureau.

23 2. The information the Community has received from the U.S. Census Bureau about  
24 response rates for the Community has been unclear and conflicting.

25 3. Until recently, the Community has been told that non-response follow-up (NRFU)  
26 rates did not include self-response rates, and that those should be added together to get to the  
27 total completion percentage. For example, in correspondence with the U.S. Census Bureau's  
28 regional Tribal Partnership Specialist for Southern Arizona, Debi Nalwood, on August 25, 2020,

1 the GRIC census office requested clarification on whether self-response and NRFU numbers are  
2 separate. Ms. Nalwood stated that NRFU household responses do not add to the self-response  
3 rate.

4 4. My office has requested daily reports from the Tucson Area Census Office to  
5 track the Community's completion percentage. Yesterday, October 6, 2020, we received the  
6 following information, which added up to a completion percentage of 101.31%:

7 Self-Response rate: 14%

8 NRFU Per cent complete: 87.31

9 Cases not started: 33

10 Open Cases: 401

11 5. In light of this information, on October 6, 2020, I called Vincent Holbrook, Lead  
12 Census Field Manager for the Tucson Area Census Office, joined by Denise Desiderio, who is  
13 one of the Community's outside advisors on census issues. We spoke with Mr. Holbrook for a  
14 long time trying to get clarification and accurate information about the Community's census  
15 response rates.

16 6. At the start of the call, we asked for clarification on how the Community reached  
17 101.31%, and he could not answer that question. We asked if the self-response percentage and  
18 the NRFU percentage should equal 100% ultimately and he initially said yes. But then he started  
19 looking at the Community's numbers and changed that answer. After reviewing the Area Census  
20 Office information for the Gila River Indian Community, he said that the self-response cases  
21 were incorrectly included with the completed NRFU cases. This means that reports that have  
22 been provided to the Community have been misleading for a significant period of time as to the  
23 current status of the completion rates.

24 7. Mr. Holbrook then stated that the total percent completion for the Community is  
25 actually only 88.01%.

26 8. In addition to the confusion around the self-response percentage, the Census Area  
27 Office has been reporting a 14% self-response for the past few days, while the Census Bureau's  
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1 self-response map for 2020 shows only a 12.4% self-response rate for Gila River Indian  
2 Community as of October 4, 2020.

3 9. Given the very low response revised response rate, we asked how many  
4 enumerators were on the Community's reservation today and the answer from Mr. Holbrook was  
5 13. We then asked why the number has dropped from a total of 33 last week to 13 yesterday.  
6 Mr. Holbrook said that the Census Bureau pulled some enumerators away because they now  
7 have until October 31, 2020 to complete field work.

8 Dated: October 7, 2020

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